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October 15, 2020

Honorable Sidney H, Stein, USDCJ US Courthouse 500 Pearl Street New York, NY 10007

**MEMO ENDORSED** 

Re: US v. Anthony Cheedie, et al

Dkt. # 19 cr 833

**Chad Allen Motion to Join Motion** 

Dear Judge Stein:

On October 13, 2020 co-defendant Cameron Brewster filed his pre-trial omnibus motions for a Bill of Particulars, suppression of certain evidence, obtain discovery and obtain other related relief. I have reviewed the motion and corresponding caselaw. I have also spoken with Mr. Brewster's attorney, Ryan Poscablo, regarding their submissions.

Based upon the foregoing, I move to have Chad Allen join the motions filed by Cameron Brewster. Specifically, Mr. Allen joins the following motions:

- 1. Bill of Particulars pursuant to FRCP 7(f);
- 2. Disclosure of *Brady*, *Giglio*, and *Jencks* Act material;
- 3. Disclosure of Grand Jury Testimony pursuant to FRCP 6(3)(E)(ii);
- 4. Permission to File Additional and Supplemental Motion and/or to Join Codefendant's motions.

As of this submission, the defense has reviewed less than 50% of the discovery already provided. The Government's rolling production of the voluminous discovery has the potential to influence future legal issues that may be subject to a motion. We will continue our due diligence and raise any additional issues in a timely fashion. Thank you for your thoughtful consideration.

Sincerely,

FOY & SEPLOWITZ LLC

Jason E. Fay

JASON E. FOY

jfoy@foyseplowitz.com

Application granted.

Dated: New York, New York October 15, 2020

SO ORDERED

SIDNEY / H. STEIN

U.S.D.J.